

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

AMERICAN CRUISE LINES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 13-324 (RGA)
	)	
HMS AMERICAN QUEEN STEAMBOAT	)	Redacted Public
COMPANY LLC, and AMERICAN QUEEN	)	Version
STEAMBOAT OPERATING COMPANY,	)	
LLC,	)	
	)	
Defendants.	)	

**DECLARATION OF PETER KENT IN SUPPORT OF  
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

MORRIS, NICHOLS, ARSHT & TUNNELL LLP  
Mary B. Graham (#2256)  
Stephen J. Kraftschik (#5623)  
1201 N. Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347  
(302) 658-9200  
mgraham@mnat.com  
skraftschik@mnat.com  
*Attorneys for American Cruise Lines, Inc.*

OF COUNSEL:

David McI. Williams (*pro hac vice*)  
Michael R. Naccarato (*pro hac vice*)  
GORMAN & WILLIAMS  
36 S. Charles Street, Suite 900  
Baltimore, MD 21201-3114  
(410) 528-0600

December 20, 2016

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

AMERICAN CRUISE LINES, INC.,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 13-324 (RGA)
v.	)	
	)	Redacted Public
HMS AMERICAN QUEEN STEAMBOAT	)	Version
COMPANY LLC, and AMERICAN QUEEN	)	
STEAMBOAT OPERATING COMPANY,	)	
LLC,	)	
	)	
Defendants.	)	

**DECLARATION OF PETER KENT**  
**IN SUPPORT OF**  
**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

I, Peter Kent, pursuant to 28 U.S.C. § 1746, and being over the age of eighteen (18) and competent to testify to the matters herein, state as follows:

1. I am an e-commerce and search engine optimization consultant and author and the owner of Peter Kent Consulting LLC. I provide online e-commerce strategies to companies seeking to improve their business online, including search engine optimization, Pay Per Click management, Web development, Web-site "conversions," usability, and Web marketing project management. I have personal knowledge of the matters set forth in this Declaration and I am competent to testify regarding these matters.

2. I have been retained by Gorman & Williams on behalf of American Cruise Lines, Inc. to review and analyze certain evidence in this case and provide opinions certain issues.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the report dated August 14, 2016 that I prepared in this action (“Kent Initial Report”). The information, facts and opinions set forth in said report are true and correct to the best of my knowledge, information and belief.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Supplemental and Rebuttal Report dated September 23, 2016 (“Kent Reply Report”) that I prepared in this action with the exception that Exhibit B to the Kent Reply Report, which is a copy of my Initial Report attached hereto as Exhibit 1, is omitted from Exhibit 2. The information, facts and opinions set forth in said report are true and correct to the best of my knowledge, information and belief.

I declare under the penalties of perjury that the foregoing is true and correct.

Executed in \_\_\_Denver\_\_\_\_\_, this \_\_\_12th\_\_\_ day of December, 2016.

A handwritten signature in black ink, appearing to read "P. Kent", is written above a horizontal line.

Peter Kent